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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CANA FOUNDATION, a non-profit corporation, LAURA LEIGH, individually, and WILD HORSE EDUCATION, a nonprofit corporation,  
*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF THE INTERIOR, BUREAU OF LAND MANAGEMENT, and JON RABY, Nevada State Director of the Bureau of Land Management,  
*Defendants.*

Case No. 2:22-cv-01200-CDS-BNW

**MOTION TO WITHDRAW**

Under Local Civil Rule LR IA 11-6, Defendants respectfully move the Court for an order withdrawing Frances B. Morris as one of their counsel due to her departure from the Department of Justice effective May 2, 2025. Defendants will continue to be represented by Michelle M. Spatz, and Ms. Morris's withdrawal will not result in delay of this case.

Dated: April 28, 2025

Respectfully Submitted,

ADAM R.F. GUSTAFSON  
 Acting Assistant Attorney General

1 United States Department of Justice  
2 Environment & Natural Resources Division

3 /s/ Frances B. Morris

4 Frances B. Morris, Trial Attorney  
5 D.C. Bar No. 1016833

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 28, 2025, I filed the foregoing Motion to Withdraw electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Frances B. Morris

Frances B. Morris

U.S. Department of Justice